

September 21, 2015

To: Centers for Medicare and Medicaid Services

Re: Public comments - Washington State Medicaid Transformation Waiver

Submitted electronically:

<https://public.medicaid.gov/connect.ti/public.comments/viewQuestionnaire?qid=1879907>

The Washington State Medical Association (WSMA) applauds the Washington state Health Care Authority's (HCA) effort to seek a Medicaid Transformation Demonstration Waiver in order to achieve its five year goals of improved health, better care and lower costs. We believe that the waiver has the potential to give our state's Medicaid program the flexibility it needs to allow new innovative models of care to successfully evolve and adapt to this new practice environment. The waiver also should include ample provision for the financial support that will be by the provider community, including physician practices, in adapting to those innovations.

As transformation of Washington's delivery system move forward, attention must be given to the need to help practices transition in a way that is financially viable, does not create unnecessary administrative burden, and does not impede on providers' ability to deliver the care their patients need in a safe and timely manner. To that end, we have strong concerns regarding the lack of detail on basic aspects of the proposal. An overview of those concerns is offered below.

Need for detail on Accountable Communities of Health (ACH) framework

The ACH model as described would provide each of the nine ACH regions with the flexibility to tailor their care delivery to address local needs. Yet there does not appear to be a template for care delivery standards and/or operational uniformity across all the ACHs. Without such a template, a potential risk is too much "variation" in their respective operational models, which in turn could pose a challenge to the state in aggregating data in analyzing the activities of physicians providing services across ACHs.

For example, in regard to the concept of rewarding incentive payments to high-performing providers, it is unclear how, and by whom, the thresholds would be established. For instance, will there be statewide standards developed by the HCA, or will each ACH create its own? Further clarity on such points is critically important.

Need for detail on mechanisms to achieve goal of quality and cost-effective long-term care

While the construct of using long-term services in the most clinically appropriate and cost-effective manner is sensible, the WSMA recommends that the HCA articulate in some detail the mechanisms it envisions that will ensure that patients' quality of care needs will be met under these new models.

While expenditures may be reduced by eliminating access to more intensive services and by conducting earlier interventions in patients' care, the concern is that some of these strategies do not achieve actual savings but merely perform cost shifting to other providers, other components of society and other governmental entities.

Need for detail and assurance of technical and/or financial support

It is unclear as to what level of technical and/or financial support the HCA intends to provide to the many stakeholders helping to establish these delivery models. Physician practices and other providers will need access to some advance payment to help with start-up activities, such as transitioning to new value-based care models. Absent those funds, practices and other providers may not be able to successfully adopt those new methods.

In addition, for physician practices and other providers, the transition to value-based care models will best be conducted in an incremental manner, providing sufficient time as not to jeopardize existing care delivery activities and avoid any adverse impact to patients and their health outcomes.

Assurance of continued stakeholder involvement

As there is no mention of the role of stakeholders, the WSMA strongly encourages the HCA to clarify that it will engage the provider community in developing reasonable and acceptable care delivery models, reporting requirements and payment methodologies.

Thank you for the opportunity to comment.

Sincerely,



Bob Perna
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Copy to: WSMA Executive Committee
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